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May 30, 2019

VIA ECF AND FIRST CLASS MAIL

The Honorable Paul A. Crotty United States District Court for the Southern District of New York United States District Courthouse 500 Pearl Street, Chambers 1350 New York, NY 10007

> RE: Federal Insurance Company, et al. v. Harvey Weinstein Civil Action No. 1:18-cv-02526 (RWLx)

Dear Judge Crotty:

This firm is insurance recovery counsel to Harvey Weinstein. Pursuant to Your Honor's Individual Practice Rule No. 1, the parties jointly request that the Court's April 29, 2019 Scheduling Order (Dkt. No. 133) be held in abeyance until the June 25, 2019 Status Conference. There have been no prior requests for an adjournment of this schedule.

As has been widely reported, an agreement in principle has been reached on the economic terms of a settlement among the parties to this action, various plaintiffs and defendants in the underlying litigation, and certain others. If memorialized and approved, the settlement will result in the discontinuance of all three related insurance coverage matters pending before this Court without the need for further discovery or motion practice. Thus, the parties jointly request that the deadlines by which the parties were directed to conduct further discovery

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pertaining to choice of law issues in accordance with this Court's March 28, 2019 Order (Dkt. No. 129) be held in abeyance. We anticipate having a further update with regard to that settlement on or before the June 25 Status Conference.

We thank the Court for its consideration of this request.

Respectfully submitted,

Jeffrey L. Schulman

cc: All counsel of record (by ECF)